

In the matter of the Application of **DANIEL MOORE**:

For an order for the return to Zimbabwe of **LIBBY JOAN MOORE** pursuant to the Provisions of the Hague Convention on the Civil Aspects of International Child Abduction

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DATED at HARARE this  
day of September 2022

.....  
**ATHERSTONE & COOK**  
Applicant's Legal Practitioners  
Praetor House  
119 Josiah Chinamano Avenue  
**HARARE (SGJB/js)**

In the matter of the Application of **DANIEL MOORE**:

For an order for the return to Zimbabwe of **LIBBY JOAN MOORE** pursuant to the Provisions of the Hague Convention on the Civil Aspects of International Child Abduction

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**AFFIDAVIT BY DANIEL MOORE**

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I, **DANIEL MOORE**, do hereby make oath and swear that:

1. I am the Applicant in this matter and I reside in Zimbabwe at 519, Reynard Road, Victoria Falls, Zimbabwe. I was born Harare, Zimbabwe, on 12<sup>th</sup> May 1982 and I have, to all intents and purposes, lived in Zimbabwe for my entire life. I am a professional hunter by occupation, and this leads me to undertake safari and hunting operations in countries within the region, principally Tanzania and Cameroon.
2. The Respondent in this matter is **VICTORIA ASHTON MOORE (nee Angelo)** who is my wife. My wife was born in New York, New York State, United States of America on 15<sup>th</sup> November 1989 and is a teacher by occupation. My wife formerly resided together with me in the matrimonial home in Reynard Road in Victoria Falls where I still reside, until her sudden departure together with our minor child (about whom more is said below) in December last year in circumstances outlined hereunder.  
I verify believe that the Respondent is resident somewhere in either New York or in New Jersey but I do not have her address and she refuses to disclose it contenting herself with directing me to send anything that requires delivery to her parents' address in New York.
3. I am, by automatic operation of law, domiciled in Zimbabwe and I regard Zimbabwe as my permanent home.

4. The Respondent, after graduation from her college education in the United States of America, travelled to Africa and I met her in Arusha in Tanzania. We began courting very shortly after we met and we courted for a period of approximately 6 years and during which period we lived together in Tanzania, albeit regularly visiting Victoria Falls to see family and for her to meet my friends and community in Victoria Falls. Ultimately in or about March 2019 she moved with me to Victoria Falls and where we set up home together in my home aforesaid during March 2019.
5. I and the Respondent had married each other a few months earlier in terms of the Marriage Act (Chapter 5:13) in Victoria Falls on 11<sup>th</sup> December 2018 and we are still so married. I attach hereto a copy of the Marriage Certificate handed to us at the time of our marriage, marked **annexure "A"**.
6. On 21<sup>st</sup> May 2019, in Bulawayo, Zimbabwe, our daughter, namely **LIBBY JOAN MOORE** was born to us. Hereinafter I shall refer to our daughter as "**LIBBY**". I attach hereto, marked **annexure "B"**, the American birth certificate of my daughter issued to us by the United States Embassy in Harare. The Respondent has the Zimbabwe birth certificate of Libby having taken it with her, together with many other of our important documents when she departed from Zimbabwe in December 2021.
7. Regrettably the marriage between myself and my wife, the Respondent, suffered a number of unhappy episodes, and which resulted in a number of frequently abusive and offensive arguments between us and during many of which the Respondent, normally in the most foul and abusive language, declared that she wanted a divorce. The Respondent seems to feel that I have not been emotionally available to her and appreciative of what she considers to be the sacrifices she has made for me. I found myself constantly met with angry remarks and constant contempt and ridicule. It seemed clear from fairly early on in our marriage that the Respondent had lost all love and respect for me. That said, we did agree that we would like to have another child. I did advise my wife, however, that before we tried for another child we should try to mend our relationship. This appeared to be the last straw for her, and she became, once

again, enraged and demanded that we divorce. Our relationship, sadly, was toxic and trying from fairly early on in the marriage and we did have therapy on and off pretty much from the time Libby was born and the Respondent was diagnosed with postpartum depression.

8. Because the atmosphere within the home was toxic and which could potentially adversely affect Libby, I agreed to depart from the marital home during October and moved into my cottage situate elsewhere in Victoria Falls and, occasionally, also lived in my father's house which was closer to the matrimonial home and, effectively, we set up a trial separation arrangement. However, we both continued to enjoy equal custody of and access to Libby pursuant to an arrangement whereby each of us would alternate 2 to 3 nights with Libby in our respective homes, the Respondent remaining in the marital home together with Libby and me having Libby in the cottage to which I had moved. During the periods that I had Libby I would be, to all intents and purposes, a single father from the time that I collected her from her mother and took her to my home. I would arrange all meals and food at meal times I would take her to school and return her home, take her to her "play dates" and generally fully care for her in every way before I then returned her to her mother for her mother's period of time with her. To all intents and purposes, we shared Libby between us and effectively enjoyed joint custody of Libby from the time that I had departed the marital home. During this period, I did have a break from latter part of October to early November for a period of approximately 2 and a half weeks. Furthermore, there was one occasion when Respondent went on holiday for a week and on that occasion, I moved back into my home and exercised custody of Libby there for a week.
9. In earlyish December 2021 I received a message from google that a foreign device had logged into my email account which I subsequently learned was my wife, the Respondent, hacking into my emails. I challenged her and she initially denied having done so, albeit very shortly thereafter letting it slip that she had done so. She subsequently advised me that she wished to take Libby to America for the Christmas holiday.

10. During December I and Respondent discussed ancillary aspects pertaining to a pending divorce, the Respondent being adamant that she and I should divorce. Incorporated within what we discussed was, as indicated above, that she would remain within the marital home with Libby, and that all pets would remain within the marital home together with her and Libby and that I should pay a minimum of USD\$1500.00 per month as my contribution for payment of general household bills and living costs and that if I failed to pay at least that amount per month then she would make arrangements to return to America. Indeed, shortly after I did vacate the marital home the Respondent procured to furnish to me a form of separation agreement. The Respondent, by now, had acquired a junior school in Victoria Falls which she ran as a business and at which she was the Headmistress and which, as I understood it, provided her with meaningful revenues monthly.

11. The arrangements between us incorporating our joint custody periods with Libby seemed to me to be working well and I very much enjoyed my periods with Libby.

12. On the evening of Saturday 18<sup>th</sup> December last year, I received a Whatsapp call from the Respondent informing me that she had boarded an aircraft at the airport (Victoria Falls International Airport) together with Libby and that she was flying to New York with Libby. This was the first intimation to me of the Respondent taking Libby from Zimbabwe. She had, approximately a week or so earlier, informed me that she wished to spend the Christmas holidays in New York and whether that was in order, and I had advised her that it was not in order because I wished to spend Christmas with Libby in Zimbabwe. I indicated that immediately after the Christmas holiday I was committed to a hunt and that she could then take Libby with her to New York to spend time with her family there.

13. As stated above, I had not been made aware in advance of the Respondent's intention to take Libby to America, and I was gutted by the news. Immediately after having received the call, I received a Whatsapp message from Respondent

to the effect that she was truly sorry but that she and Libby were on their way to New York to be with her family and that she was not doing well being "stuck" in Zimbabwe and that Libby was suffering because she, Respondent, was suffering, and apologizing for the fact that protecting herself and her mental stability meant that I would not be able to see my daughter on Christmas. She went on to state that I was a great dad and that she was very sorry that ".....it has to be this way...". I attach hereto marked **annexure "C"**, the entirety of the lengthy Whatsapp message that I received.

14. Clearly the removal from Zimbabwe of my daughter without prior notice and without my prior knowledge, let alone consent, is wrongful and is a clear and obvious breach of the provisions of Article 3 (a) of the Convention on the Civil Aspects of International Child Abduction which was signed at the Hague on the 25<sup>th</sup> October 1980 (hereinafter referred to as "the Convention"). Given that at the time of such removal I and my wife had been in every respect exercising joint custody of Libby and living in fairly close proximity to one another in Victoria Falls. I and the Respondent were exercising our rights of custody jointly at all material times, and but for the wrongful removal from Zimbabwe of Libby I would be continuing to exercise such rights of custody.
15. It will be noted, in particular, that the Respondent does, in her Whatsapp message, **annexure "C"** hereto, state that she and Libby have return tickets for the following month, January 2022 and that she was not relocating to the United States, but simply visiting her family for 3 weeks. The allegation that I threatened to put the Respondent in jail is false and I deny it. I have at no stage threatened her. All I did was point out to her that her hacking of my electronic devices, and in particular my computer constituted a criminal offence with serious potential penalties, and which could include incarceration, so she shouldnot do it. I did not, in any way, indicate to her that I would take this aspect anyfurther. Indeed, I have clearly informed her I would not be taking it further.
16. From the time of Libby's removal from me I have been trying to have contact with her via her mother and which was initially, for about 3 months or so,

permitted to me. I have explained to her that with my work commitments, and which necessarily take me to safari hunting areas where, more often than not, there is simply no Wi-Fi or other digital communication signal capacity, I am very much hamstrung and accordingly restricted as to opportunities where I am capacitated to be able to speak to my daughter and see her on Facetime or Video link on those occasions where this has been permitted by her mother.

17. With immediate effect after her departure from Zimbabwe I did commence monthly financial contributions to the Respondent but, within little more than 2 weeks or so after departing, her mother's demands for me to pay very significantly in excess of the average monthly amount that I had been paying for my daughter's welfare, being an average of USD\$1 500.00 monthly, became significantly more strident and demanding and contemptuous of what she considered to be the hugely inadequate financial contribution that I was making. But such contribution is, by reference to my own earning from my occupation as a professional hunter, as much as I am able to afford.

18. Then on 27<sup>th</sup> January I received a bombshell Whatsapp from the Respondent which reads as follows: -

"After a lot of thought, reflection and consideration I have made the decision to permanently move back to New York. I am going to put a Head in charge or sell the school. Support is the most important thing right now. Is Harley staying at the house? Does he need to? I need to have the dogs watched so I would like Gloria to stay, but if you want rent or whatever the dogs need to be sorted before I have made a plan for them. I would appreciate your help with that. I have also been advised to not leave the country until a legal Court ordered custody arrangement has been put in place or the divorce is finalized. I am waiting for responses from my lawyer; however, you seem to be further along so the sooner that's addressed the better. Since we are both out of country, I believe we need to file a document requesting it gets processed without us in country. If this is not finalized by the time you have a break in your hunts, you are welcome to

come see Libby in New York. However, I do not feel safe nor comfortable travelling to Zimbabwe without knowing the official arrangement of my daughter."

(The reference to "Harley" in this Whatsapp is a reference to a relative of mine who, when I am away from my home and given that there is now no presence there of my wife, I ask to stay at my home as a house sitter and to supervise the home and to attend to looking after the pets that still live there).

I attach a copy of the Whatsapp message as **annexure "D"**.

19. Subsequently the Respondent did indicate that she was considering returning to Zimbabwe sometime in March during the course of a discussion with me and during which discussion she did mention that she had obtained legal representation in America.

20. Two days after receiving the Respondent's notification as set out in **annexure "D"** above, I addressed an email to her on Saturday 29<sup>th</sup> January as follows: -

"Please would you come back to Zim on dates you said you would, im begging you. i really want to see Libby. i have given no reason in the past for you to think there is a safety issue. i fly back to Cameroon end March beginning April. i have nothing up my sleeve a assure you i just want to see Libby. i want our divorce handled amicably as i have said many times before. Please consider this for me. Thanks. Dan".

I attach hereto the said Whatsapp communication dated 29<sup>th</sup> January 2022 marked **annexure "E"**.

21. On 16<sup>th</sup> March 2022 I sent to the Respondent an email which reads as follows:-

"i will consistently pay what is affordable due to my earning capacity. i earn an inconsistent amount of money and i earn an African salary. These are not viable amounts for me to send to you every month based on what i earn. If you would like me to take some time away to look after Libby while you find your feet in New

York to be able to support the lifestyle you desire I have no hesitation and will do so happily. Please in the meantime could you return Libby to her country of birth that she was taken away from illegally and without consent from me. And when our divorce is finalized we can both maneuver within our respective boundaries set by the law. Please can you advise me without delay when you will be returning with Libby to Zimbabwe as the previous dates you set you never stuck to."

I attach hereto the said email communication dated 16<sup>th</sup> March 2022 and which reflects the Respondent's unhelpful contemptuous response and my follow-up request that Respondent unblock me so as to enable me to telephone my daughter, marked **annexure "F"**.

22. On 16<sup>th</sup> March 2022 I addressed a Whatsapp to Respondent inquiring as to whether she had received my email of the same date (i.e. the one referred to in para 21 above) and on the following day I sent her a Whatsapp asking to speak to Libby if she is available. I received no response and I again addressed Respondent by Whatsapp on Saturday 17<sup>th</sup> March asking her to let me know when I could chat again. Then on Sunday 18<sup>th</sup> March I received a series of Whatsapp communications from the Respondent to some of which I did reply. The reality is that I was refused permission to speak to my daughter. I attach hereto, marked **annexure "G"** the Whatsapp string between myself and the Respondent between the period 16<sup>th</sup> to 18<sup>th</sup> March.

23. I make the point, again that the Respondent's actions in deliberately continuing to retain our daughter in America seemingly with no intention of returning her to Zimbabwe is, again, wrongful and a clear breach of the provisions of Article 3 of the said Convention. I wish to strongly make the point at this juncture, here and now, that the most precious thing in the world to me is that I have a meaningful, loving and committed relationship with my daughter Libby, which will necessarily include regular communication with her, and as many periods of extended physical access as possible wherever practicable and affordable. Indeed, I am

considering a possibility of venturing into an alternative career which would obviate me having to be absent for extended periods of time whilst on hunting safaris in other countries than the country in which I live and where I am domiciled, being Zimbabwe.

24. Clearly the fact that the Respondent considers that I am paying an insufficient amount of financial support for my daughter in America is not germane or any valid legal basis for Respondent to have wrongfully removed Libby from her country of habitual residence, the country in which she was born and has lived all her life until she was wrongfully removed, and to continue to retain her from me, notwithstanding her initial undertakings to return with Libby during the early course of this year. What I respectfully seek from the Courts of the country to which Libby has been wrongfully removed, and in which she continues to be wrongfully retained, is an Order compelling Respondent to procure the return to Zimbabwe of Libby without unnecessary delay and where the matter of the custody of Libby and the entitlement of Libby and myself for Libby to have a meaningful and loving committed relationship with me will be determined either pursuant to the judicial proceedings which I have already instituted in Zimbabwe in terms of a divorce action dated 21<sup>st</sup> April 2022 (but which papers I have not yet been able to serve upon the Respondent), or in such other manner as is wholly consistent with law.

25. It is clear to me that the Respondent now has no intention of returning with Libby to Zimbabwe, and most certainly no intention of procuring the return to Zimbabwe of Libby without her. In this regard I attach hereto, marked **annexure "H"** an earlier email string between myself and the Respondent on 2<sup>nd</sup> March and the contents of which are self-explanatory. The Respondent's contempt and insults and abusive language only gets worse in its offensiveness and egregiousness. There can be little doubt that she will be emotionally manipulating our daughter against me from this very early age and which is desperately distressing and manifestly against our daughter's best interests. I reiterate that Libby has a legal, constitutional and internationally recognized right and entitlement to the benefits and joys of being cared for and mentored by a

loving and caring and committed father as well as by her mother. And yet almost immediately after receipt of my email to her dated 16<sup>th</sup> March (annexure "F" aforesaid) the Respondent has **TOTALLY** blocked me from any form of communication with Libby. The last occasion on which I was permitted to speak to Libby was on or about 30<sup>th</sup> or 31<sup>st</sup> March. I did send out messages to her father very courteously requesting him to ask his daughter to reconsider her stance but she continues to fail to allow me to have regular communication with Libby in terms of an agreed and acceptable programme.

26. At or about the end of March I received Whatsapp communications from Respondent declaring positively that she is not returning to Zimbabwe and falsely claiming the reason as being that I am threatening her. I attach hereto, marked Annexure "I", the Whatsapp string between myself and the Respondent. The final page of that Whatsapp string will be noted refers to Gloria, Gloria being our domestic worker in the marital home, and which is a message by the Respondent to Gloria, and which Gloria in turn imaged to me, and where Respondent makes it clear again that she is not returning to Zimbabwe.

27. I continued, generally unsuccessfully, to beg, plead and implore Respondent to allow me to have communication with our daughter. I also continued to address her father in a desperate attempt to seek his intervention, as indicated previously in this affidavit, and my efforts thus far have proved unsuccessful. Sometime in May I did receive a response from her father clearly stating that he cannot get involved in the dispute between myself and his daughter. I also received, shortly after hearing from her father, a Whatsapp communication from the Respondent to her entire family requesting that they block me and everyone she knows in Victoria Falls from communicating with her or any member of her family. I attach hereto the email string between myself and her father ("Dave") and a copy of her Whatsapp to her family Whatsapp group in which she requests that everyone remove and block me from every social media account of any family member. These enclosures are marked annexure "J" and annexure "K" respectively.

28. In order to establish that I do pay regularly to the welfare of my daughter I attach hereto marked **annexure "L"** proof of payment of the amount of USD\$4 510.00 to the Respondent for the support of our daughter, being for the months up to and including August. I have, thus far, since Respondent departed from Zimbabwe paid in excess of USD\$16 000.00.

29. I wish to place on record that many communications that I have received over the months since Respondent absconded from Zimbabwe taking with her Libby, and all documentation pertaining to Libby, some of which, such as her Zimbabwean birth certificate are very important documents, Respondent has taken to sending very insulting and contemptuous and false allegations and information allegedly pertaining to me reflecting me as some kind of unfeeling narcissist and manipulative rogue who has no respect or consideration for anyone, including his family and his clients. Some examples of such behaviour is reflected in a number of the annexures to this affidavit. As has also been seen, some of these communication allege that I am no kind of father or healthy role model for our daughter. When the Respondent took to addressing third party hunting operators who employ me to undertake hunts on behalf of clients, and which would potentially prejudice my position with such persons and thus my capacity to be able to earn income, I considered that it was necessary to take action to regularize the record. Consequently I procured my legal practitioners in Harare Zimbabwe, to address a letter to the Respondent to warn her of the implications of such conduct and also to demand the return to Zimbabwe of Libby in order to avoid the need for the institution of a costly legal application for an order in the courts of the country to which Libby has been wrongfully removed by Respondent, to procure the return of our daughter to Zimbabwe. And also to advise the Respondent of the fact that I have already instituted legal proceedings claiming a decree of divorce and appropriate ancillary relief in the High Court of Zimbabwe, albeit that I have not yet been able to serve the papers on her .

I attach hereto, marked **annexure "M"** copy of the said letter dated 3<sup>rd</sup> June 2022 and which I furnished to her by email letter dated 6<sup>th</sup> June 2022 addressed to her email address. I attach hereto, marked **annexure "N"** a copy of the email

dated 6<sup>th</sup> June sending the letter, annexure "M" aforesaid, and the letter itself attached thereto. There has been no response whatever to the said letter – other than, possibly in a somewhat indirect manner, in that the Respondent has totally desisted from submitting any further scandalous and insulting material of me on Whatsapp or email or any other form of communication either to me, or so far as I am aware, to any third party with whom I have any form of acquaintanceship or relationship.

30. I respectfully submit that:-

- 30.1. The removal from Zimbabwe, to all intents and purposes clandestinely, of Libby is wrongful in being a breach of Article 3 of the said Convention given that I was exercising custody rights over Libby at the time of such removal, and would continue to do so but for such removal;
- 30.2. The continued retention by Respondent of Libby in the United States of America is wrongful in constituting a breach of Article 3 of the said Convention;
- 30.3. The Respondent has clearly stated an intention and, by her conduct embarked upon implementation of such intention, namely to remove Libby entirely from my life, declaring that she needs to protect her from me and my family, and which has included blocking on her communication devices me and my family and my friends and my associates in Victoria Falls, and encouraging every member of her family to do likewise;
- 30.4. As I have already indicated earlier in this affidavit, I love and care deeply for my daughter and my fundamental desire in my life is for her and myself to enjoy a normal, loving and caring paternal relationship and which, in my respectful submission, is unarguably in her best interests. Indeed, even the Respondent herself admitted that I am "....a great dad" (annexure "C" infra) who loves and cares for his daughter and even undertaking to return her to Zimbabwe after a period of 3 weeks visitation

with her parents, before she, the Respondent, became fiercely and illogically and bewilderingly hateful of me.

31. In the premises I respectfully pray that the Honourable Court before which this respectful application is placed, praying for the immediate return of my daughter, Libby Joan Moore, to Zimbabwe, her country of habitual residence, grant an order against Respondent obliging her to forthwith return Libby to Zimbabwe, pursuant to the provisions of Article 11 and Article 12 of the said Convention.

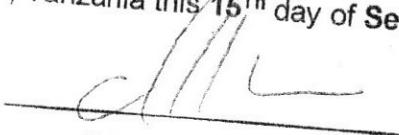
32. I continue to reside in my stated home address in Victoria Falls, and which is "house sit" for me, as appears above, while I am away conducting contracted hunting safaris.

I shall ensure, however, once I know that my daughter is coming home, that I am home with her and that I fully and responsibly take care of her and ensure that she is fully secure, safe and happy, with all her needs fully attended to.

33. Very recently, I have been permitted to speak with Libby twice per week for approximately 15 minutes each time, albeit under supervision, pursuant, I understand, to an Order granted by a Court in America. I am happy to have this opportunity to speak to my daughter, although I confess to feeling somewhat like a prisoner who is permitted telephone access with a family member twice a week. I strongly resent the fact that such calls need to be under supervision as though I am a prisoner subject to the authority of a prison officer.

34. I close in repeating my prayer to the Court as set out in paragraph 31 above.

Dated and signed at Arusha, Tanzania this 15<sup>th</sup> day of September, 2022.



DANIEL MOORE

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VERIFICATION

I, DANIEL MOORE, do hereby verify and state that what is written in paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33 and 734 are true to the best of my knowledge and belief.

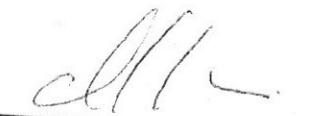
Verified at Arusha, Tanzania this 15<sup>th</sup> day of September, 2022.

  
DANIEL MOORE

SWORN and DELIVERED at ARUSHA, TANZANIA  
by the said

DANIEL MOORE

Who is known to me personally; in my presence  
This 15<sup>th</sup> day of September, 2022.

  
DEPONENT

BEFORE ME:

Name: SHEDRACK BONIFACE MOFULU

Signature: 

Address: P.O. BOX 15376, ARUSHA – TANZANIA

Qualification: ADVOCATE/COMMISSIONER FOR OATHS.

MR No.

ZIMBABWE

MARRIAGE ACT (CAP. 5:05) 11

DUPLICATE ORIGINAL REGISTER

Number 05 11/18

Full names of parties  
and Nationality  
Passport No.

Names of parties  
and Nationality  
Passport No.

Where and when  
and by whom  
marriage was

DANNER MOORE

BACHELORE 12/05/02 519 REYNARD ROAD  
36 yrs VICTORIA FALLS

OWN

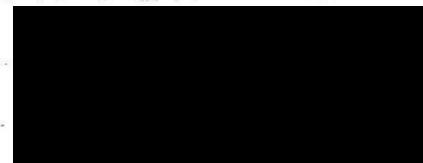
MARRIAGE  
LICENCE

VICTORIA ASHTON ANGELO  
USA PASSPORT

SPINSTER 15/11/89 519 REYNARD ROAD  
29 yrs VICTORIA FALLS

OWN

Signature  
and ID No. of  
Witnesses  
to the  
marriage



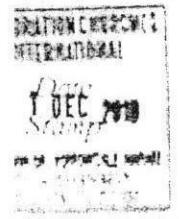
ZAMBEZI EXPLORER JETTY

Marriage was solemnized by me at VICTORIA FALLS on this day of DECEMBER, 2018.

Signature  
and ID No.

63-790561 025  
Marriage Off.

MINISTER OF RELIGION  
OR LOCAL PASTOR



UNITED STATES OF AMERICA

DEPARTMENT OF STATE

0767440

0767440

*Consular Report of Birth Abroad*  
OF A CITIZEN OF THE UNITED STATES OF AMERICA

This is to certify that:

LIBBY JOAN MOORE

Son female, born at SULAWAYO, ZIMBABWE

On May 21, 2019

Acquired United States CITIZENSHIP at birth, as established by documentary evidence  
Presented in the Consular Service of the United States at

HARARE, ZIMBABWE

On OCTOBER 16, 2019

WITNESSETH PARENTS

VERONICA ASHTON MOORE

Date of Birth: NOVEMBER 15, 1989

Date of Birth: MAY 12, 1982

*QCCW*

Assistant Secretary for Consular Affairs  
Date of issuance: OCTOBER 17, 2019

160-762084

\*1024703-53\*

**From:** daniel moore <eroomdan1982@gmail.com>  
**Sent:** Tuesday, 15 March 2022 09:02  
**To:** sgjbsec2@praetor.co.zw; sgjbsec@praetor.co.zw  
**Subject:** Messages  
**Attachments:** E1FAAB30-32C6-4BC6-9959-FB3E8F3008EF.png;  
E9A3EDF1-31C9-4227-85DB-72BE902F4A67.png; D4683DBE-1CCC-4892-  
A22D-152BE8BE7DFC.png; CE0BEDDC-A316-4A3E-A32A-9A71134729CE.png

My messages from victoria minutes before taking off to the states.

08:56



Victoria



Missed video call at 18:09

I cannot believe this is where we are now. I truly am sorry, but libby and I are on our way to New York to be with my family. I begged and pleaded for you to understand. I am not doing well being stuck here completely alone and libby is suffering because I am suffering. I am so very sorry that protecting myself and my mental stability means that you cannot see your daughter on Christmas. I wish there was a way that I could be supported and still let you see her but unfortunately you have done everything in your power to make me feel unsafe, unsupported, unloved and alone here. I have no one. You are a great dad Dan and if I trusted you to let me leave with her I would have loved for you to say goodbye to her properly and to have your own Christmas together. I am so sorry that it has to be this way, I know you will be devastated and that breaks my heart. This is not to hurt you or do anything to you intentionally, I have put your needs above mine for 10 years and during this extremely difficult time, I needed to put myself and my child first. She does not miss you the way she misses me and I could not leave her in the state she has been in with you for two weeks. That would be very unfair to



08:57



Victoria



misses me and I could not leave her in the state she has been in with you for two weeks. That would be very unfair to her. You will never understand my situation because you've never left your comfort zone so I won't continue trying to explain how isolated and alone I feel. There is a flight to New York on the 21st, you are more than welcome to come spend Christmas with us in New York and fly straight to Cameroon. I just need the support of my family. My parents will make you feel as welcome as possible and I will be as cordial and non emotional as possible. It would be nice to have you if you want.

I'm sure your anger will surpass the ability to think rationally about the situation I have been put in. We have return tickets for January, I will send those along to you as I would like to make it very clear that I am not moving to the states right now, I am just visiting my family for 3 weeks. Your refusal to sign separation papers and your threatening to put me in jail has made me feel extremely insecure in this country. It breaks my heart that libby will grow up a child of divorce but she will be better off with a mother who is happy and treated right, rather than w...

Read more

18:11



08:57



Victoria



grow up a child of divorce but she will be better off with a mother who is happy and treated right, rather than watch her mother be emotionally abused. I loved you, I loved you so much I was willing to lose myself for you...but I cannot do it anymore. Your behavior over the past 3 months has shown that I never mattered to you and that has been extremely difficult to process. In my current state of mind, I cannot clearly make the decision to sell my school and leave forever or try to get a work permit and stay. Vic falls town is cruel and you have made it very difficult for me so I hope with a month of love and support I will be able to make a better judgement on what I will decide for my future. Regardless we are returning in January and you of course will see her in February when you are back. Please call as much as you would like, you can access pictures on the Tinybeans app. Outside of calling for Libby, please respect my space and do not text me at all. Send voice notes, videos or call but I do not want to text. I left your Christmas presents in a bag in the laundry room. I am sorry it has gotten to this point and that I ever trusted you to take care of me and support me, but this is our new reality. I am hoping by the time you are back,



08:57



Victoria



gotten to this point and that I never  
trusted you to take care of me and  
support me, but this is our new reality.  
I am hoping by the time you are back,  
with some time at home with friends  
and family, I will be able to speak to you  
cordially and not be so hurt and utterly  
broken. Again, I am very sorry that you  
cannot spend Christmas with Libby this  
year, I truly am but my own sanity is  
more important. You've missed many  
holidays and birthdays before. I hope  
you can find it in your heart to  
understand why I needed to do this. And  
I reiterate that we are coming back. I  
hope this time allows us both to get  
some clarity and that things can be  
more amicable when we return. Libby  
loves you and I will never stop that or  
take you from her- I just really need to  
be surrounded by loved ones right now  
and I wish you could have understood  
that.

18:11

Missed video call at 18:12

She wanted to say goodbye

18:12

I'm sorry.

18:21

Where ate you now

18:21

Taking off

18:24



**From:** Daniel Moore <danielmooreadventures@gmail.com>  
**Sent:** Thursday, 27 January 2022 06:12  
**To:** sgjbsec@praetor.co.zw; sgjbsec2@praetor.co.zw  
**Subject:** Fwd: Future

Tbis i have just recieived from victoria.

Pls advise

Sent from my iPhone

begin forwarded message:

**From:** Victoria Angelo <v.angelo415@gmail.com>  
**Date:** 27 January 2022 at 01:46:26 WAT  
**To:** Daniel Moore <danielmooreadventures@gmail.com>  
**Subject:** Future

After a lot of thought, reflection and consideration I have made the decision to permanently move back to New York. I am going to put a head in charge or sell the school. Support is the most important thing right now.

Is Harley staying at the house? Does he need to? I need to have the dogs watched so I would like Gloria to stay, but if you want rent or whatever the dogs need to be sorted before I've made a plan for them. I would appreciate your help with that.

I have also been advised to not leave the country until a legal court ordered custody arrangement has been put in place or the divorce is finalized. I'm waiting for responses from my lawyer, however you seem to be further along so the sooner that's addressed the better. Since we are both out of country I believe we need to file a document requesting it gets processed without us in country.

If this is not finalized by the time you have a break in your hunts, you are welcome to come see Libby in New York, however I do not feel safe nor comfortable traveling to Zimbabwe without knowing the official arrangement of my daughter.

**From:** Daniel Moore <danielmooreadventures@gmail.com>  
**Sent:** Saturday, 29 January 2022 16:37  
**To:** sgjbsec@praetor.co.zw; sgjbsec2@praetor.co.zw  
**Subject:** Re: Future

Vic,

Please would you come back to zim on dates you said you would im begging you . I really want to see libby. I have given no reason in the past For you to think there is a safety issue. I fly back to cameroon end march beginning april. I have nothing up my sleeve i assure you i just want to see libby. I want out divorce handled amicably as iv said many times before.

Please consider this for me ,

Thanks

Dan

Sent from my iPhone

On 27 Jan,2022, at 05:12, Daniel Moore <danielmooreadventures@gmail.com> wrote:

Tbis i have just recievied from victoria.

Pls advise

Sent from my iPhone

Begin forwarded message:

**From:** Victoria Angelo <v.angelo415@gmail.com>  
**Date:** 27 January 2022 at 01:46:26 WAT  
**To:** Daniel Moore <danielmooreadventures@gmail.com>  
**Subject: Future**

After a lot of thought, reflection and consideration I have made the decision to permanently move back to New York. I am going to put a head in charge or sell the school. Support is the most important thing right now.

Is Harley staying at the house? Does he need to? I need to have the dogs watched so I would like Gloria to stay, but if you want rent or whatever the dogs need to be sorted before I've made a plan for them. I would appreciate your help with that.

I have also been advised to not leave the country until a legal court ordered custody arrangement has been put in place or the divorce is finalized. I'm waiting for responses from my lawyer, however you seem to be further along so the sooner that's addressed

Daniel Moore <[danielmooreadventures@gmail.com](mailto:danielmooreadventures@gmail.com)>

Thu 8/18/2022 3:20 PM

To: sgjbsec Atherstone and Cook <sgjbsec@praetor.co.zw>;sgjbsec2 Atherstone and Cook <sgjbsec2@praetor.co.zw>

Sent from my iPhone

Begin forwarded message:

**From:** Daniel Moore <danielmooreadventures@gmail.com>  
**Date:** 18 March 2022 at 15:50:03 EAT  
**To:** Victoria Angelo <v.angelo415@gmail.com>  
**Subject: Re: Libby**

Vic,

Please unblock me so that i can speak with libby. Or ask your parents if they can hold phone at a time convenient for them while i speak with her .

Dan

Sent from my iPhone

On 16 Mar,2022, at 14:22, Victoria Angelo <v.angelo415@gmail.com> wrote:

On Mar 16, 2022, at 3:32 AM, Daniel Moore <[danielmooreadventures@gmail.com](mailto:danielmooreadventures@gmail.com)> wrote:

## Victoria ,

I will consistently pay what is affordable due to my earning capacity. I earn an inconsistent amount of money and i earn anAfrican salary. These are not viable amounts for me to send to you every month based on what i earn.

If you would like me to take some time away from hunting to look after Libby while you find your feet in New York to be able to support the lifestyle you desire I have no hesitation and will do so happily.

Please in the meantime could you return Libby to her country of birth that she was taken

advise me without delay when you will be returning with Libby to zimbabwe as the previous dates you set you never stuck to.

Daniel

Sent from my iPhone

09:19



Victoria

started the process of deleting and  
blocking you.

15:06

So it's just a matter of time really

15:06

Lawyers are dealing with paperwork its  
out of my hands

15:09

So I'm gonna go, I just wanted to give  
you the opportunity to do the right  
thing. What you decide to do really isn't  
up to me. I already know where this  
leads. So what was it, April you leave for  
Cameroon? So I would just assume that  
if divorce papers aren't sent (I don't  
really even care about that) and money  
isn't sorted that once your flight takes  
off, so does your title as dad.

15:10

I don't care for your excuses. This  
doesn't change my life. I'm sole provider  
of Libby regardless, working my dick off  
to provide and protect her without your  
help. It won't be a change for me it will  
be a change for you and your "keeping  
up appearances" as some caring loving  
dad. So I'm just letting you know.

15:12

Can i speak with libby?

15:18

So again, please send 5k by the time  
you leave. Thanks

15:13



09:18



Victoria



abuse, you have no right to be in your  
daughters life.

15:00

I give you all the permission in the world  
to go around saying I'm a horrible  
person and this and that to save face for  
yourself/ but the reality is you simply  
don't get the title of dad if you are never  
there physically emotionally or  
financially. And quite frankly, I don't care  
what anyone in that shithole town thinks  
of me. The thought of never having to  
speak to you or any one associated with  
you ever again makes me feel hopeful  
that Libby will live a safe and protected  
life.

15:02

Vic i have never abused you emotionally  
or physically.

15:04 ✓

Can i call and speak with libby

15:04 ✓

You can call or send an email explaining  
divorce papers and money.

15:05

I'm sure you are too self centered to  
notice but all my friends and family have  
started the process of deleting and  
blocking you.

15:06

So it's just a matter of time really

15:06



09:17



Victoria



Thursday

Vic did you get my email

11:41

Friday

Can i chat to libby? If shes available ?

17:05

Saturday

Let me know when i can chat again  
please

17:09

Sunday

I would just like to reiterate my stance.

You have sent less than 25% of what it costs me to raise your child. If you do not contribute 2,500 dollars at least a month (which is still less than half of monthly expenses for her) and send this money to back account for January to May before you leave for Cameroon, we will be disappearing from your life. That is another 5k at minimum.

I wanted to clearly state this so that you known exactly what is expected. If you cannot contribute to this family to help us start over here after your years of abuse, you have no right to be in your daughters life.

15:00



**From:** Daniel Moore <[danielmooreadventures@gmail.com](mailto:danielmooreadventures@gmail.com)>

**Date:** 02 March 2022 at 23:28:53 CAT

**To:** Victoria Angelo <[v.angelo415@gmail.com](mailto:v.angelo415@gmail.com)>

**Subject: Re: Arrangement**

Please log out of my accounts . I will have someone redo everything but would appreciate you not being logged into my social accounts .

Sent from my iPhone

On 02 Mar,2022, at 16:59, Victoria Angelo <[v.angelo415@gmail.com](mailto:v.angelo415@gmail.com)> wrote:

The hole I created? The hole I created was marrying you. I've done more for my career and my life in 10 years than you've done in 40 sweetheart. The hole I'm in. Hilarious joke.

I'm American honey. What you seem to never have understood is that I don't need to be in Africa nor do I have to explain why I feel safer in a 1st world country away from your lies and your threats. I don't need to return to zim. I don't need to spend my own money or time so that you can pretend to be a dad. Your efforts are your own and she'll figure it out for herself how little you put in. You could come visit I, bring your little girl her puppy and her kitty but 1,500 is too expensive for you to come visit it isn't? Or is it being out of your comfort zone around a bunch of people you don't know? Cause you know that's what I did to fit in to your world. But you'll

Blame your dads illness when he's been dying of alcoholism for 15 years and your little back story and that's fine. I will not be guilted in to going to. 3rd world country ive been threatened in for your sake. What a good one.

You really are so fucking pathetic and so

Incredibly delusional. I cant wait to see the divorce papers. I'll make sure to save them so libby can see what a caring father you really are.

Hahahaha come to Zimbabwe for you? Ah your funny.

On Mar 2, 2022, at 8:17 AM, Daniel Moore <[danielmooreadventures@gmail.com](mailto:danielmooreadventures@gmail.com)> wrote:

Also you have a perfect opportunity to bring libby back and see me . You took her away from me . It was never for libbys protection . It was for your own selfish want to escape the hole you created for yourself. I have never shown anything but love for libby and i only have her happiness at heart.

Sent from my iPhone

On 02 Mar,2022, at 14:10, Daniel Moore <[danielmooreadventures@gmail.com](mailto:danielmooreadventures@gmail.com)> wrote:

Understood .

December was paid in cash you signed for it.

2185 sent for jan you confirmed this in your email. Its a portionn of feb. I will pay the remainder . And march soonest.

Dan

Sent from my iPhone

On 02 Mar,2022, at 13:49, Victoria Angelo <[v.angelo415@gmail.com](mailto:v.angelo415@gmail.com)> wrote:

Also.

1. I made over 2k, so I don't know where this amount is coming from/ I find it hilarious you think your 2,000 dollars sent in the beginning of January is some sort of amazing gift for us. What a joke.

2. You have sent 2k since December. That is December, January and February. You had cash for December which we did not have access to. I

I don't know what world you think 1,500 is going to do anything to help cover the costs of your child. You used me for my money for years- how many flights, cameras, boots, clothes and things for libby, my wedding band did I pay for that you said "you'd pay me back for". So while you send this to your lawyer why don't I print out the giant list of money you owe me from over the years you cheap pathetic mooch

3. Continue to use the word abscond. I'm sure it took you a while to find it in the dictionary or to process it from your lawyer. We've been here since December 17. I have been asking for a divorce since September. So really your excuses just make me laugh.

4. Sweetie, you are permanently logged into my laptop, my phone and my computer. You are also still logged in on Facebook and Instagram which I've told you numerous times. I refer to you showing up unannounced and uninvited continuing to message me when I asked you not to and refusing to pay money until 3 weeks into the month.

5. You are an emotionally abusive, narcissist psychopath and I just see you for what you are now. My therapists main concern is that Libby will grow up to feel the same disappointment and abandonment from you as I did because you aren't capable of any normal human emotion and that she will join me in the cycle of abuse you think is some sort of real relationship because your sick and pathetic. So no amount of you pretending to care and crying about how your sad will ever make me change my boundaries. Protecting Libby from your emotional abuse and protecting myself is my only priority now. As I said, if you cared you'd be here visiting instead of making excuses and attempting to threaten me, you'd send more than 2k in 3 mothns- you'd make sure we have a car and enough to enroll in early childhood education but you haven't asked once about that have you? Have you asked are we okay? Do we have a car? Do we have cash for food? Do we have enough money for Libby to be put in school!? Is libby processing things? How is she handling emotionally? What's her schedule when can I come see her? Nope- you don't ask because all you think you have to do is send your little creepy videos she has no interest in watching so you can put on a show for the immoral pathetic humans you call acquaintances. My life purpose isn't to hurt you- I simply don't think about you or care about you and I refuse to have a soulless psycho make me ever feel anyway for doing what I need to to ensure the best life for my child.

6. I've said numerous times now that I am doing what has been suggested by a childcare Professional, the fact you care more about yourself seeing her to say hi than the mental well being of your child just goes to show your true intentions and your selfish ways. Honey, say whatever you wanna say about yourself- tell everyone you send money, tell everyone you care and you send videos when you can, at the end of the day, libbys gonna learn what you did to us and the sad excuses you made to justify your pathetic and sad actions and she'll also eventually see you for what you are on her own.

Bottom line Daniel: I see you for what you are, you know exactly what you've done and what kind of person you are and I'm just not going to be bullied into feeling bad that I'm Protecting my child from a man that can't even call her on time or provide for her.

This is my last email explaining things to you. I just will no longer respond to things like this because you just don't get it and don't care.

On Mar 2, 2022, at 6:58 AM, Victoria Angelo <[v.angelo415@gmail.com](mailto:v.angelo415@gmail.com)> wrote:

Do you think 1,500 dollars is supposed to help us? Sorry you're sad about the arrangement however your feelings are no longer my concern. Thanks.

On Mar 2, 2022, at 12:58 AM, Daniel Moore <[danielmooreadventures@gmail.com](mailto:danielmooreadventures@gmail.com)> wrote:

Vic i tried calling 3 minutes after time you gave and you had blocked me already.

I am sending money as soon as i get to good internet. I only owe you remainder of feb and onwards. Please dont accuse me of not providing financial support i have proof of every cent iv sent you. What i send you is as much as you ever made at any job you held in africa.

You chose to abscond with out prior arrangement. You have only in the last month or so told me your intention to remain in the states .

Boundaries are necessary from my behavior? I assume your talking about you hacking into my emails? Or me coming to the house to see my daughter.

Vic im only asking you to stop doing g these things to hurt me and let me have proper access to libby.

I am travelling this afternoon so may not be able able to call libby i would appreciate it if you left you phone on and when im in wifi in ethiopia ill call. Videos and messages i send while you block me dont go through .

Dan

Sent from my iPhone

On 02 Mar,2022, at 03:46, Victoria Angelo <[v.angelo415@gmail.com](mailto:v.angelo415@gmail.com)> wrote:

I am doing what has been advised by a child psychologist and my therapist for the well being of both Libby and myself. You have access to Libby 4 times a week for a specified time and will be contacted if there is any emergency. Boundaries are necessary, realistic and fair. From your behavior before leaving Zimbabwe, it is clear you struggle when people hold up boundaries, therefore blocking you outside the contact hours of Libby is essential.

Interesting you complain about your time, yet didn't bother calling her today during that time or answering when I tried calling to remind you. Funny you sit around whining about when you can call your daughter who has no capacity for holding more than a 2 minute conversation but have no interest in providing financial support to ensure she has clothes, food, education and transport. Your smoke and mirrors game doesn't work here anymore sweetie, financial support is more important than your 15 second videos you send so that you can show your friends and lawyers you are such a devoted daddy as we sign up for food stamps and welfare.

As discussed your times are Monday-Thursday 5pm to 6pm your time, I will unblock my phone 15 minutes before and will keep the phone on an extra 10 minutes after 6. Any emergencies you will be notified immediately. Once you go back to Cameroon, we can discuss changing times or days around to better fit your needs, however there will be set times and that is final. Your inability to follow through during those times are not my responsibility nor my problem.

On Tue, Mar 1, 2022 at 5:03 PM Daniel Moore <[danielmooreadventures@gmail.com](mailto:danielmooreadventures@gmail.com)> wrote:  
Vic i dont feel this arrangement is fair and my access to libby is already restricted and is it necessary to block me because i never answered one minute into my allowed talked time . Im asking you to reconsider this arrangement as i have not agreed to it but simply been told what to do as usual.  
Please reconsider

Sent from my iPhone

18:33



Victoria

FRI, 18 MAR, 10:20

Vic please let me chat with libby.

You cant just cut me off from her  
like this

Monday 16:04

Please unblock me so i can speak  
with libby

Tuesday 11:59

I will not be on time for call tonight  
as im flying please leave your  
phone on and i will call when i arrive  
in addis

No

Let me know what you'd like your  
new time to be. I don't leave my  
phone on to speak to you thank  
you.

Tuesday 19:48

Please can you send me some pics  
and videos of libby ?

Tuesday 21:31

Please send divorce papers and



iMessage



18:33



Victoria >

new time to be. I don't leave my phone on to speak to you thank you.

Tuesday 19:48

Please can you send me some photos and videos of libby

Tuesday 21:31

Please send divorce papers and actual child support.

Wednesday 05:24

Please can you send me your address so I can send you something for Easter and birthday

Wednesday 12:08

5 pm my time please I will call libby

Wednesday 17:02

Can I call

Wednesday 20:10

Can you try whatsaapp when I try facetime it never goes through



iMessage



18:34

Victoria

Thursday 13:33

Please let me know when divorce papers or your lawyer will be contacting me. That is ok for me.

Thursday 17:02

Can I please call now?

Thursday 21:38

Please let me know when divorce papers or your lawyer will be contacting me. That is ok for me.

Sure! Its almost 8pm, when can i speak with libby?

not your schedule. told you a month ago, its not my responsibility to know your schedule or remind you to put a schedule in place. 5 pm doesn't work for us, she has school and I have a job.

I have blocked you on every single platform because you clearly don't get it-I will call verizon and have all of your family and your numbers blocked indefinitely if you continue. Thanks.



iMessage



18:34

Victoria

of your family and your numbers  
blocked indefinitely if you continue.  
Thanks.

So i dont get what ?? that you just  
block me if you dont get what?

I am not a threat to you i just want  
to talk to my daughter

I don't have to do shit for you, just  
like you don't have to pay the  
correct amount of child support or  
file for divorce

pleas leave us alone.

Sorry Vic i want leave you alone you  
are with libby and i have a right to  
be in her life and to speak with her  
daily . Please allow this to happen

sure.

Friday 06:26

Verify it's you

danielmooreadventure@gmail.com

To help keep your account secure, Google needs to verify  
it's you. Please sign in again to continue to Google  
Calendar.



Message



18:35



< 1

Mancu Reynald Gloria H...  
last seen today at 18:31



Oky fine 17:01

Yesterday

Forwarded

Hi Gloria sorry I didn't get back to you. I  
am not coming back as Dan is  
threatening and I don't trust him. I'm  
sorry we didn't get to say goodbye  
Gloria!

I am going to start having people come  
organize my things, clothes. Can you  
please send me pictures of what the  
house looks like 07:10

Morning , its from Vicky 07:11

Forwarded

Hi Gloria sorry I didn't get back to you. I  
am not coming back as Dan is  
threatening and I don't trust him. I'm  
sorry we didn't get to say goodbye  
Gloria!

I am going to start having people come  
organize my things, clothes. Can you  
please send me pictures of what the  
house looks like 08:33

Thanks 18:08

Please send more updates when you  
get . 19:51



22:17

DA

Dave

Good morning . I hope this finds you well. I understand you wont reply and will notify victoria as soon as you receive this message. I am however asking as kindly as i possibly can that you try reason with vic to allow me to be able to have calls with libby. I am available for calls should you ever want to speak with me . Thank you.

Today 21:30

Dan I am very sorry what has happened between you and Victoria but I cannot get involved.  
I'm sorry.

The right thing to do Dan is to pack up her personal belongings and ship them to NY she left everything behind even her computer that she worked hard to get a degree, stuff from my dad to remember him, jewelry etc. I will pay for the shipping to get this stuff here and if possible help make arrangements to get Scout to America. You know what that dog means to her. And you have to pay child support that is just the right thing to do! This is



iMessage



22:17

Dave

to get Scout to America. You know what that dog means to her. And you have to pay child support that is just the right thing to do! This is all I can say so if you want to do the right things maybe the situation will improve. She is very hurt, mad and upset by all this as I know you are too. I was so proud of her for fulfilling her dream an opening the school which she had to abandon too. Let me assure you Libby is doing great and is a smart adorable sweet girl, funny to like her mom.

I have not restricted Vic from taking dog or any of her belongings. She can collect or have them picked up when she wishes. I have had cats neutered and jabs updated for export before I left. I have sent 1500 per month since before December. This is more than double what state laws in Long Island require for someone in my pay bracket and a lot more than required in Zimbabwe. I was denied access to Libby on her birthday. This is unacceptable as you can imagine for a parent to swallow.

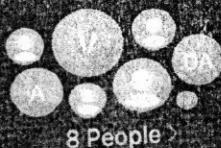
Delivered



iMessage



22:33



8 People

Saturday 19:10

Michael Angelo left the conversation.

Today 22:27

Victoria

It's embarrassing I need to send this, but please can everyone remove, defriend and block Dan on every social media account and his phone number and iCloud. Please also delete anyone you may be friends with on Facebook or Instagram from Victoria falls.

Today 22:33

Vics Mom removed Victoria from the conversation.

Vics Mom

Ok will do



iMessage



Q W E R T Y U I O P

A

S

D

F

G

H

J

K

L

Z X C V B N M

↑

123

space

return



18:53

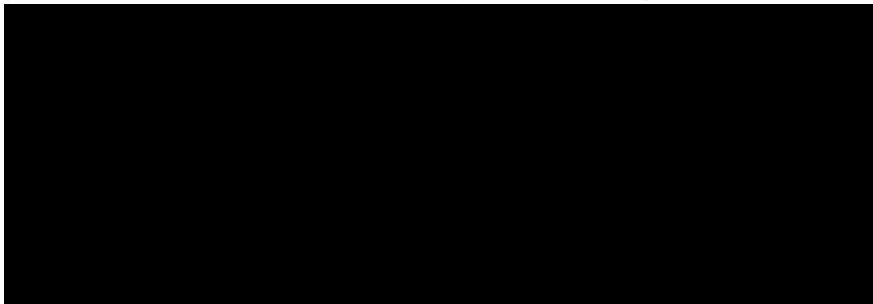
MOORE MR D PIA USD

## To Recipient



USD - SWIFT - FUNDS-TO-VICTORIA

Victoria Angelo



## Details

Amount	USD 4,510.00
Value date	30 May 2022
Purpose of	Child support
Payment	Money for child support june- august
Narrative	

## Complete

Pay the amount USD 4,510.00 from account  
[REDACTED] to pay the sum of USD 4,510.00 to  
recipient Funds-to-victoria.

In some cases, other banks have to be involved with  
international payments. These banks may deduct  
their charges in addition to those noted above and

[secure.currency.lloydsbank.com](http://secure.currency.lloydsbank.com)

**ATHERSTONE & COOK**

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Our ref: Mr Bull/s

3<sup>rd</sup> June 2022

Mrs Victoria Angelo Moore  
New York  
**UNITED STATES OF AMERICA**



Dear Madam

**RE: OUR CLIENT MR DANIEL MOORE**

We act on behalf of our above-named client in connection with your marriage to him and from which marriage has been born the minor child Libby.

You have been demanding a divorce from our client for some time and although he initially advised you that he felt that it was preferable in the interests of your daughter to attempt to save the marriage, he is now satisfied that the marriage is irretrievably broken down.

To that end he has proposed the institution of action out of the High Court of Zimbabwe of the divorce Summons and Declaration.

He wishes to have the papers to be served upon you either in the United States (which will require him to obtain the leave of our High Court to do so and which process will take some time and expense) or upon a local lawyer chosen by you, who will need to be authorised by a Power of Attorney signed by you and sent to him/her by you.

A member of



Independent legal &amp; accounting firms

Partners:

S.G.J Bull B.L, LL.B; G.M Crosland B.A, LL.B; L.A Cook B.Proc; I. Chagonda B.L, LL.B;  
C.C Chitiyo B.L, LL.B; C. Mhike LL.B (Hons), L.L.M; T. Nyarinasoka LL.B (Hons); M. P Khumalo B.S.S,  
L.L.B; T. Chagudumba LL.B (Hons); A.N Manuel LL.B (Hons); T. M Chagonda LL.B (Hons).

Assisted by:

R.J.T Kadani L.L.B (Hons).

You have, as you are aware, relocated unilaterally from your home in Victoria Falls back to New York in America without any prior notification to our client of your intentions, and you took Libby with you, again unknown to our client until you were already on the aircraft immediately before take-off.

Effectively therefore you have kidnapped Libby from her father who hoped initially that he could reason with you to persuade you to return with her and for the two of you to agree the important aspects of custody of Libby and non-custodian parent access to Libby.

It is a fundamental human right of the minor child to have a loving and beneficial and meaningful relationship with both such child's parents.

However, it is now clear from your increasingly strident, offensive and threatening WhatsApps to our client and to a number of third parties that your settled intention is to block Libby and her father from having any relationship whatsoever between them.

All your material allegations against our client are entirely unfounded and false. They are seriously defamatory of our client and calculated to insult and to injure, and they give rise to an action by our client for an award against you for substantial general damages in his favour, together with general legal costs.

Your most recent e-mail sent to our client's employer in respect of the hunting contract in Tanzania is not only serious defamatory of our client, but also jeopardises his ongoing employment with such employer – and obviously his ability to earn an income.

Our client is legally entitled and obliged to pursue the return to Zimbabwe of Libby.

Our client is entitled further to an Order directing you to cease with immediate effect your abusive, unfounded and defamatory communications and to an Order for substantial general damages and as may be applicable, special financial damages.

Accordingly we are instructed to demand, as by this letter we hereby do, that:-

1. You ensure the return to Zimbabwe within 14 days of receipt of this letter of your daughter Libby, and immediately fully cooperate to enable our client to communicate directly with Libby.

2. You desist with immediate effect from any further WhatsApp or other communications to our client and to any third party of a defamatory and/or offensive and/or negative nature concerning our client.
3. You ensure receipt by our client and by his current employer in Tanzania in respect of the safari hunt contract currently undertaken by our client, of a letter of unconditional apology to our client and of unconditional withdrawal of all the false allegations against our client.

Should you fail to comply with this letter, our client shall without further notice, institute legal proceedings against you for an Order for the return to Zimbabwe of his daughter, and for substantial damages for defamation together with an Order for payment of legal costs by you.

Yours faithfully

  
ATHERSTONE & COOK

**From:** sgjbsec@praetor.co.zw  
**Sent:** Monday, 06 June 2022 08:02  
**To:** 'v.angelo415@gmail.com'  
**Subject:** D MOORE  
**Attachments:** Victoria 6.6.22.pdf

Dear Madam

Please find attached for your urgent attention and kindly acknowledge receipt.

Jackie Giya  
PA to SGJ Bull  
Atherstone & Cook  
119 Josiah Chinamano Avenue  
HARARE

Tel: 263-4-704244/08677 044 999  
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